

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

RICHARD ALEXANDER
MURDAUGH, JR.,

Plaintiff,

v.

BLACKFIN, INC., WARNER BROS.
DISCOVERY, INC., WARNER
MEDIA ENTERTAINMENT PAGES,
INC., AND CAMPFIRE STUDIOS INC.,

Defendants.

Civil Action No.: 9:24-cv-04914-RMG

**MOTION TO DISMISS OF
CAMPFIRE STUDIOS INC.**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Campfire Studios Inc. (“Campfire”)¹, respectfully moves this court for an Order dismissing Plaintiff’s Amended Complaint. The basis for this Motion is that the Amended Complaint fails to state a claim upon which relief can be granted.

¹ As explained in the Amended Answer to Local Rule 26.01 Interrogatories, Campfire is an improper party because the company that produced the Campfire Documentary is HCM, LLC, which is wholly owned by Campfire Film & TV, LLC. See Dkt. 44. Neither of the Warner Entities is a correct party either. *Id.* Based on the allegations of the Amended Complaint (none of which the Warner Entities concede), Plaintiff should have identified WarnerMedia Direct, LLC, Discovery Communications, LLC, and Discovery Digital Ventures, LLC instead of WBD and Warner Media Entertainment. Campfire and all of the Warner Entities reserve all rights and waive none by filing this Motion.

This Motion is supported by applicable law, Campfire's Memorandum of Law filed simultaneously herewith, and any additional supporting memoranda that may be submitted by Campfire at or before any ruling on this Motion.

WHEREFORE, Defendant Campfire Studios Inc. respectfully requests that the Court enter an Order Dismissing Plaintiff's Amended Complaint.

Respectfully submitted,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

s/ MERRITT G. ABNEY

David E. Dukes, Esq. (Federal Bar No. 00635)

E-Mail: david.dukes@nelsonmullins.com

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

Merritt G. Abney, Esq. (Federal Bar No. 09413)

E-Mail: merritt.abney@nelsonmullins.com

151 Meeting Street / Sixth Floor

Post Office Box 1806 (29402-1806)

Charleston, SC 29401-2239

(843) 853-5200

WILLKIE FARR & GALLAGHER LLP

Meryl C. Governski, *admitted pro hac vice*

Kristin Bender, *admitted pro hac vice*

Willkie Farr & Gallagher LLP

1875 K Street NW

Washington, DC 20006

(202) 303-1000

mgovernski@willkie.com

kbender@willkie.com

*Attorneys for Defendants Blackfin, Inc., Warner Bros.
Discovery, Inc., Warner Media Entertainment Pages, Inc. and
Campfire Studios Inc.*

Charleston, South Carolina
April 22, 2025